In the name of God

Islamic Republic of Iran CPB NFP

Executive Secretary,
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RE: SUBMISSION OF INFORMATION REQUESTED IN DECISION BS-VII/12 ON RISK ASSESSMENT AND RISK MANAGEMENT
AND
IRAN'S VIEW ON THE "REPORT OF THE AD HOC TECHNICAL EXPERT GROUP ON RISK ASSESSMENT AND RISK MANAGEMENT (UNEP/CBD/BS/RARM/AHTEG/2015/1/4, DATED NOV. 30, 2015)"

Dear Sir: May 31, 2016

Reference to CBD notification 2015-138, dated Dec. 1, 2015 inviting parties to submit to the secretariat a) information on their needs and priorities for further guidance on specific topics of risk assessment (RA) of living modified organisms and b) existing guidance on specific topics of RA of living modified organisms, Islamic Republic of Iran presents its needs and priorities for the followings

1) Technical and financial assistance in strengthening biosafety laboratories and development of detection of LMOs.

2) Simplified version of guidance is required for daily use by biosafety officers avoiding complicated and sophisticated bulky guidelines as it holds on the current guidance.

We believe the existing guidance is complicated and is not easy to use. The revision has made it more complicated and has caused further ambiguities and confusions.

We wish to take this opportunity to comment on the REPORT OF THE AD HOC TECHNICAL EXPERT GROUP ON RISK ASSESSMENT AND RISK MANAGEMENT (UNEP/CBD/BS/RARM/AHTEG/2015/1/4, DATED NOV. 30, 2015). As it is rightly and clearly stated in the objective and scope of the guidance, the objective is "to provide a reference that may ASSIST parties and… in implementing the provisions of the protocol with regards to RA… It is therefore expected that this guidance is a facilitating and explanatory tool for better understanding and implementing the RA according to the protocol. We so however face difficulties in understanding and

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interpreting the guidance and sometimes need to consult back to the text of the protocol itself in order to better understand the guidance. In short this guidance is too complicated, unnecessarily long and parts of it contradict the protocol itself and/or the rest of the text. Yet, sometimes the guidance calls for further completion/explanation in future!

In line 154 of the part 1, the roadmap is introduced as a "supplement" to Annex III of the guidance. This may imply that the guidance is a "supplementary" [protocol(?)] to the CPB, and/or national biosafety policies and legislations! We therefore would like to suggest the word "supplements" with the word "describes".

It is recommended that the fragment stating from "including" on the line 169 of the report to the end of the sentence is deleted since it may be misleading.

The three terms "protection goal, assessment endpoints and measurement endpoints" are more confusing than helping. As it is obvious even the AHTEG was not able to provide examples for these terms in lines 196 to 213 (box). The entire text is therefore requested to be revised where this terms are used.

The "adverse" effect of the unintended effect referred to in line 187 is not acceptable from our point of view. It may require explanation on how it is possible that is not possible in other plant improvement techniques such as mutation breeding and why this should be considered a unique feature for LMOs only. Revision is therefore amended.

In Line 256 it is implied clearly that independent experts could "themselves perform" risk assessment! This is not possible. The risk assessment could be only "evaluated" by independent experts and NOT performed.

Iran will provide more comprehensive evaluation of the AHTEG report and will submit it to the secretariat within the next week.

With my best personal wishes.

Sincerely yours;

B. Ghareyazie

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